

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
AT WHEELING

COMPLAINT OF BELLAIRE VESSEL)
MANAGEMENT, LLC, AS OWNER OF) Civil Action No. 5:18-cv-00115
THE M/V CAPT ROBERT G HARRISON)
AND BELLAIRE HARBOR SERVICE, LLC)
AS CHARTERER OF THE M/V CAPT)
ROBERT G HARRISON FOR EXONERATION)
OR LIMITATION OF LIABILITY)

IN THE MATTER OF CAMPBELL)
TRANSPORTATION CO., INC. AS OWNER,) Civil Action No. 5:18-cv-00138
AND INLAND MARINE SERVICE, INC.,)
AS OPERATOR AND OWNER PRO)
HAC VICE OF THE M/V LOUISE S,)
OFFICIAL NO. 513659, FOR EXONERATION)
FROM OR LIMITATION OF LIABILITY)

IN THE MATTER OF CAMPBELL)
TRANSPORTATION CO., INC. AS OWNER,) Civil Action No. 5:18-cv-00137
OF THE M/V JAMES R. MOREHEAD,)
OFFICIAL NO. 1032410, FOR EXONERATION)
FROM OR LIMITATION OF LIABILITY)

EXPERT WITNESS BIOGRAPHICAL SKETCH OF
BELLAIRE VESSEL MANAGEMENT, LLC AND BELLAIRE HARBOR SERVICE, LLC

Pursuant to this Court's Scheduling Order (Dkt. 187), Complainants, Bellaire Vessel Management, LLC and Bellaire Harbor Service, LLC (collectively, "Bellaire"), by and through their undersigned counsel, submit the following expert witness biographical sketch:

1. Larry L. Childress
116 Beaupre Drive
Luling, Louisiana 70070
Telephone: 504-458-3527
Larry0449@gmail.com

Mr. Childress is an experienced and accomplished inland river barge surveyor, shipyard supervisor, fleet manager, and supervisor with over thirty-five years of experience in all phases of fleet operations and installation, including fleet oversight, maintenance, inspections and recordkeeping, personnel supervision, vessel dispatching / traffic, barge moorings, barge repair and dry-docking, procurement of outside barge and vessel repairs, estimating job costs and competitive bidding on repair work for shipyard, cleaning, repair of and management of tow boats / fleet boats / line-boats, as well as customer relations and communications, and handling all phases of insurance claims and related lawsuits, seeking to offer professional consulting services to interested parties as well as serve in the capacity of an expert witness in marine related matters.

Mr. Childress will offer testimony, inter alia, as to the cause of the Breakaway Event and as to the reasonableness of the total claim for the damages that Bellaire suffered in connection therewith.

A copy of Mr. Childress's curriculum vitae is attached hereto as **Exhibit 1**.

Date: August 17, 2023

Respectfully submitted,

BABST, CALLAND,
CLEMENTS & ZOMNIR, P.C.

By /s/ Leonard Fornella
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Attorneys for Complainants/Claimants,
Bellaire Harbor Service, LLC and
Bellaire Vessel Management, LLC

CERTIFICATE OF SERVICE

I hereby certify that, on August 17, 2023, true and correct copies of the foregoing Biographical Sketch were served via the ECF electronic filing system upon the following:

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